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Proposed Attorneys for Debtors and Debtors in  
Possession, SCOOBEEZ, SCOOBEEZ GLOBAL,  
INC., and SCOOBUR, LLC

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**LOS ANGELES DIVISION**

IN RE:

SCOOBEEZ, ET AL.

DEBTORS AND DEBTORS IN POSSESSION.

AFFECTS:

- ☒ ALL DEBTORS
- ☐ SCOOBEEZ, ONLY
- ☐ SCOOBEEZ GLOBAL, INC., ONLY
- ☐ SCOOBUR LLC, ONLY

Case No. 2:19-bk-14989-WB  
Jointly Administered:  
2:19-bk-14991-WB; 2:19-bk-14997-WB

CHAPTER 11

**DECLARATION OF RICHARD W. LASATER  
IN SUPPORT OF THE DEBTORS'  
APPLICATION FOR AN ORDER  
AUTHORIZING AND APPROVING BRIAN  
WEISS AS CHIEF RESTRUCTURING  
OFFICER OF THE DEBTORS *NUNC PRO  
TUNC* TO MAY 16, 2019**

JUDGE: HON. JULIA BRAND

1 I, Richard W. Lasater, hereby declare:

2 1. I am an individual over 18 years of age. I have personal knowledge of the facts stated herein as  
3 more fully set forth below or have gained such knowledge by review of the file and if called as a  
4 witness, I could and would competently testify thereto.

5 2. I make this Declaration (i) in support of the application (the "Application")<sup>1</sup> filed by Scoobeez,  
6 Scoobeez Global, Inc., and Scoobur, LLC (collectively the "Debtors") for entry of an order, pursuant to  
7 sections 105(a) and 363(b) of the Bankruptcy Code, authorizing the Employment and Retention of Brian  
8 Weiss as Chief Restructuring Officer of the Debtors *Nunc Pro Tunc* to May 16, 2019 and (ii) to address  
9 certain concerns raised in the Objection to Application for an Order Authorizing and Approving  
10 Appointment of Brian Weiss as Chief Restructuring Officer of the Debtors *Nunc Pro Tunc* to May 16,  
11 2019 (the "UST Opposition") filed by the United States Trustee (the "UST"). All facts in this  
12 Declaration are based on my personal knowledge, information gathered from my review of relevant  
13 documents, and information supplied to me by the Debtors or their professionals.

14 3. I am a corporate and securities lawyer with Foley & Lardner LLP, the proposed general  
15 bankruptcy counsel law firm to the Debtors.

16 4. In the UST Opposition, the UST appears to cite for judicial notice by the Court various  
17 pleadings and allegations submitted by the Debtors' lender, Hillair Capital Management, LLC  
18 ("Hillair"). Among those allegations are Hillair's allegations in its Opposition to Debtors' Motion for  
19 Entry of Interim Order Authorizing Use of Cash Collateral on an Interim Basis [Dkt. No. 45] that the  
20 Debtors have an obligation to make public securities filings of alleged defaults under the loan  
21 documents with Hillair, and recent Uniform Commercial Code and judgment filings.

22 5. The disclosure rules of the Securities and Exchange Commission, Sections 12 and 15 of the  
23 Securities and Exchange Act of 1934 (the "Exchange Act"), require disclosures to be made by  
24 companies that are "registrants" under the Exchange Act.

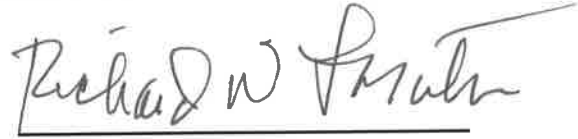
25 6. The Debtors are not "registrants" under the Securities Exchange Act of 1934.

26 7. Moreover the "OTC Guidelines" cited by Hillair are available at  
27 \_\_\_\_\_

28 <sup>1</sup> Capitalized terms not defined herein have the terms ascribed to them in the Application.

1 <https://www.otcm Markets.com/corporate-services/information-for-pink-companies>. They are merely  
2 guidelines not regulations. As indicated on the aforementioned website, companies listed on the Pink  
3 Open Market, such as Scoobeez Global, Inc., do not have disclosure requirements.

4 I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of  
5 May, 2019 at Los Angeles, California.

A handwritten signature in black ink, appearing to read "Richard W. Lasater", is written over a horizontal line.

Richard W. Lasater

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
Foley & Lardner LLP, 555 South Flower Street, Suite 3300, Los Angeles, CA 90072-2411

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF RICHARD W. LASATER IN SUPPORT OF THE DEBTORS' APPLICATION FOR AN ORDER AUTHORIZING AND APPROVING BRIAN WEISS AS CHIEF RESTRUCTURING OFFICER OF THE DEBTORS NUNC PRO TUNC TO MAY 16, 2019**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 05/28/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

John-Patrick M Fritz jpf@lnbyb.com, JPF.LNBYB@ecf.inforuptcy.com

Alvin Mar alvin.mar@usdoj.gov

Ashley M McDow amcdow@foley.com,

sgaeta@foley.com;mhebbeln@foley.com;swilson@foley.com;jsimon@foley.com

Rejoy Nalkara rejoy.nalkara@americaninfosource.com

Anthony J Napolitano anapolitano@buchalter.com, IFS\_filing@buchalter.com;salarcon@buchalter.com

David L. Neale dln@lnbyb.com

Gregory M Salvato gsalvato@salvatolawoffices.com,

calendar@salvatolawoffices.com;jboufadel@salvatolawoffices.com;gsalvato@ecf.inforuptcy.com

Steven M Spector sspector@buchalter.com, IFS\_efiling@buchalter.com;salarcon@buchalter.com

United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) 05/28/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Julia W. Brand

United States Bankruptcy Court

Central District of California

Edward R. Roybal Federal Building and Courthouse

255 E. Temple Street, Suite 1382

Los Angeles, CA 90012

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

05/28/2019

Sonia Gaeta

/s/ Sonia Gaeta

*Date*

*Printed Name*

*Signature*